

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MAPLEBEAR, INC., D/B/A	§	
INSTACART,	§	
	§	CIVIL ACTION NO. 25-CV-00137-
Plaintiff,	§	MTS
	§	
v.	§	
	§	<u>JURY TRIAL DEMANDED</u>
FALL LINE PATENTS, LLC,	§	
	§	
Defendant.	§	

**Declaration Of Matthew J. Antonelli In Support Of
Fall Line's Reply In Support Of Its Motion To Transfer To The
Eastern District Of Texas Under The First-To-File Rule**

I, Matthew J. Antonelli, am a member of the bars of the states of Texas and New York and have been admitted *pro hac vice* to this Court for the purpose of this action. I am one of the attorneys representing Fall Line Patents, LLC. I make this declaration based on my personal knowledge and, if called as a witness, I could and would competently testify to the matters set forth herein.

1. Attached hereto as Exhibit A is a true and correct copy of an order from *Fall Line Patents, LLC. v. Zoe's Kitchen, Inc.*, Case No. 6:18-cv-00407-RWS, Dkt. No. 151 (E. D. Tex.), that was issued on May 25, 2021.

2. Attached hereto as Exhibit B is a true and correct copy of an order from *Fall Line Patents, LLC. v. Zoe's Kitchen, Inc.*, Case No. 6:18-cv-00407-RWS, Dkt. No. 336-1 (E. D. Tex.), that was issued on July 7, 2023.

3. Attached hereto as Exhibit C is a true and correct copy of a transcript of a hearing that was held on May 7, 2025 in *Fall Line Patents, LLC. v. 7-Eleven, Inc.*, Case No. 5:24-cv-167-RWS (E. D. Tex.).

4. Attached hereto as Exhibit D is a true and correct copy of a declaration executed on April 2, 2025, by Stephen Munday, a Staff Software Engineer for Maplebear, Inc. d/b/a Instacart and filed in *Fall Line Patents, LLC. v. Sprouts Farmers Market, Inc.*, Case No. 5:24-cv-182-RWS (E. D. Tex.). at Dkt. No. 28-3.

5. Attached hereto as Exhibit E is a true and correct copy of Defendants' Motion To Dismiss filed on February 10, 2025 in *Fall Line Patents, LLC v. Aldi Inc.*, Case No. 5:24-cv-172-RWS (E.D. Tex.) at Dkt. No. 19.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 21, 2025.

/s/ Matthew J. Antonelli
Matthew J. Antonelli

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of July 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew Antonelli
Matthew Antonelli